

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK DIVISION**

JOANNE NEALE, KERI HAY, KELLY
MCGARY, SVEIN A. BERG,
GREGORY P. BURNS, DAVID TAFT,
JEFFREY KRUGER and KAREN
COLLOPY individually and on behalf of
others similarly situated,

Plaintiffs,

v.

VOLVO CARS OF NORTH AMERICA,
LLC, and VOLVO CAR CORPORATION,

Defendants.

Civil Action No. 2:10-CV-04407-MCA-JAD

STIPULATION AND CONSENT ORDER

WHEREAS, this matter having come before the Court by way of an informal joint application of Plaintiffs, by and through their counsel, Andrew W. Ferich, Esq., Chimicles Schwartz Kriner & Donaldson-Smith LLP and Defendants, by and through their counsel, Paul Daly, Esq., Hardin, Kundla, McKeon & Poletto, P.C.; and the parties having stipulated and agreed on a date whereby Plaintiffs will file a renewed motion for class certification;

WHEREAS, Defendants have indicated that they will need to evaluate the renewed motion and supporting materials to determine whether they will need to take the depositions of any witnesses associated with plaintiffs' class certification filing and therefore, how long they will need to file an opposition; and good cause having been shown:

IT IS, on this 16th day of June 2020, **ORDERED** that:

1. Plaintiffs' renewed motion for class certification is to be served (but not filed) on Defendants on **July 15, 2020**;

2. On or before **July 20, 2020**, the parties are required to meet and confer to determine what, if any, depositions need to be taken and a proposed briefing schedule for Defendants' opposition and Plaintiffs' reply.

3. On or before **July 27, 2020**, the parties shall submit a proposed Order to the Court setting forth the proposed schedule for any depositions and the remaining class certification briefing.

IT IS SO ORDERED

/s/ Joseph A. Dickson

Honorable Joseph A. Dickson, U.S.M.J.

We hereby consent to the form and
Entry of this Consent Order

CHIMICLES SCHWARTZ KRINER
& DONALDSON-SMITH LLP
Attorneys for Plaintiffs

HARDIN, KUNDLA, MCKEON & POLETTO
Attorneys for defendants

s/Andrew W. Ferich
ANDREW W. FERICH

s/Paul Daly
PAUL DALY